## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

NABIL ISKANDER	) CASE NO. 1:18-cv-183
Plaintiff,	) ) JUDGE DAN A. POLSTER
vs.	) MAGISTRATE JUDGE DAVID A. ) RUIZ
AMERICAN METAL COATINGS, INC.	)
	) JOINT MOTION OF THE PARTIES
Defendant.	) FOR APPROVAL OF
	CONFIDENTIAL SETTLEMENT

For the reasons set forth below, Plaintiff Nabil Iskander and Defendant American Metal Coatings, Inc., hereby move this Court for an Order approving the confidential settlement as fair and reasonable.

In support of this Motion, the parties state that:

- 1. Plaintiff alleged in the Complaint, among other things, claims for alleged unpaid compensation under the Fair Labor Standards Act, 29 U.S.C. §§ 201 et seq. ("FLSA") and Ohio Revised Code Chapter 4111.
- 2. Defendant contended, and continues to contend, that Plaintiff was not entitled to the claimed overtime compensation for a variety of reasons.
- 3. Plaintiff and Defendant are represented by their respective counsel.

  In an effort to reach a compromise and to avoid the expense and burden of litigation, the parties, without any admission of liability as to any of the asserted claims, have reached a settlement of all claims asserted in the pending action. The terms are embodied in the Confidential Joint Stipulation of Settlement Release, which have been emailed to the Court.

- 4. Plaintiff's counsel believes that the proposed Settlement is fair and reasonable. *See* Exhibit 1, which has been emailed to the Court.
- 5. The proposed settlement between the parties is contingent upon the Court's review and approval and issuance of an Order approving the settlement as fair and reasonable.

WHEREFORE, Plaintiff and Defendant request that the Court enter an Order (*see* Exhibit 2) approving the confidential settlement agreement between the parties as fair and reasonable.

Respectfully submitted,

## /s/ Lori M. Griffin

Lori M. Griffin (0085241)
Chastity L. Christy (0076977)
Anthony J. Lazzaro (0077962)
The Lazzaro Law Firm, LLC
920 Rockefeller Building
614 W. Superior Avenue
Cleveland, Ohio 44113
Phone: 216-696-5000
Facsimile: 216-696-7005
chastity@lazzarolawfirm.com
anthony@lazzarolawfirm.com

Attorneys for Plaintiff

## /s/ Mark S. Fusco

Mark S. Fusco (0040604)
Sara Ravas Cooper (0076543)
Rina R. Russo (0087761)
Walter Haverfield LLP
1301 East 9th Street, Ste 3500
Cleveland, OH 44114-1821
Phone: 216-928-2928
Facsimile: 216-916-2353
mfusco@walterhav.com
scooper@walterhav.com
rrusso@walterhav.com

Attorneys for Defendant